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22 *(additional counsel on Exhibit A)*

23 **UNITED STATES BANKRUPTCY COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION**

26 In re:

27 PG&E CORPORATION

28 - and -

1 PACIFIC GAS AND ELECTRIC
2 COMPANY,

3 Debtors.

4 Affects Both Debtors

5 Affects PG&E Corporation

6 Affects Pacific Gas and Electric Company

7 Case No. 19-30088 (DM) (Lead Case)
8 Chapter 11
9 (Jointly Administered)

10 **NOTICE OF SECURITIES LEAD
11 PLAINTIFF'S MOTION TO APPLY
12 BANKRUPTCY RULE 7023 TO CLASS
13 PROOF OF CLAIM**

14 Date: January 14, 2020
15 Time: 10:00 a.m. (Pacific Time)
16 Before: Hon. Dennis Montali,
17 United States Bankruptcy Court
18 Courtroom 17, 16th Floor
19 450 Golden Gate Avenue
20 San Francisco, California 94102

21 **Objection Deadline:** December 23, 2019 at 4:00
22 p.m. (Pacific Time)

1 **PLEASE TAKE FURTHER NOTICE** that on January 29, 2019, PG&E Corporation
2 and Pacific Gas and Electric Company, the debtors in possession (the “**Debtors**”) in the above-
3 captioned chapter 11 cases (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief
4 under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United
5 States Bankruptcy Court for the Northern District of California (San Francisco Division) (the
6 “**Bankruptcy Court**”).

7 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold an omnibus
8 hearing on January 14, 2020 at 10:00 a.m. (Pacific Time) (the “**Omnibus Hearing**”) in the
9 courtroom of the Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17,
10 16th Floor, 450 Golden Gate Avenue, San Francisco, California 94102.

11 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters scheduled
12 for the Omnibus Hearing, the Bankruptcy Court is scheduled to hear *Securities Lead Plaintiff’s*
13 *Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim* (the “**Motion**”), which was filed
14 by Public Employees Retirement Association of New Mexico (“**Lead Plaintiff**”), the court-
15 appointed lead plaintiff in the securities class action captioned as *In re PG&E Corporation*
16 *Securities Litigation*, Case No. 18-03509 (N.D. Cal.), on December 9, 2019.

17 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion
18 must be in writing, filed with the Bankruptcy Court, and served on the counsel for Lead Plaintiff
19 at the above-referenced addresses so as to be received by no later than 4:00 p.m. (Pacific Time)
20 on December 23, 2019. Any oppositions or responses must be filed and served on all “Standard
21 Parties” as defined in, and in accordance with, the *Second Amended Order Implementing Certain*
22 *Notice and Case Management Procedures* entered on May 14, 2019 [ECF No. 1996] (the “**Case**
23 **Management Order**”). Any relief requested in the Motion may be granted without a hearing if
24 no opposition is timely filed and served in accordance with the Case Management Order. In
25 deciding the Motion, the Court may consider any other document filed in these Chapter 11 Cases
26 and related Adversary Proceedings.

27 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting
28 papers can be viewed and/or obtained: (i) by accessing the Court’s website at

1 http://www.canb.uscourts.gov, (ii) by contacting the Office of the Clerk of the Court at 450
2 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims
3 agent, Prime Clerk LLC, at http://restructuring.primeclerk.com/pge or by calling (844) 339-4217
4 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
5 pginfo@primeclerk.com. Note that a PACER password is needed to access documents on the
6 Bankruptcy Court's website.

7 Dated: December 9, 2019

8 Respectfully submitted,

9 **LOWENSTEIN Sandler LLP
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10 By: /s/ Randy Michelson
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12 *Bankruptcy Counsel to Lead Plaintiff and the Class*

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21 *Counsel for the Securities Act Plaintiffs*

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23 **VANOVERBEKE, MICHAUD & TIMMONY,
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24 *Additional Counsel for the Securities Act Plaintiffs*

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71 *Additional Counsel for the Securities Act Plaintiffs*

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